

BEFORE THE
POSTAL REGULATORY COMMISSION

Periodic Reporting (Proposal Five)

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Docket No. RM2018-8

MOTION OF UNITED PARCEL SERVICE, INC. TO EXTEND
FILING DEADLINE
(August 17, 2018)

United Parcel Service ("UPS") hereby respectfully requests that the deadline for filing comments in the RM2018-8 docket regarding a proposed change to the way the Postal Service calculates and reports the costs of Inbound Letter Post,¹ be extended by one week until August 29, 2018, on the grounds set forth herein.

Although the original deadline was set by the Commission on June 28, 2018, this docket included two chairman's information requests in July and August. The Postal Service's petition also relied on nonpublic materials, for which UPS moved for access on the basis that given Proposal Five's reliance on nonpublic materials, meaningful participation in this docket will not be possible without the data underlying the Postal Service's proposal.² Access was granted on August 1, 2018.³

¹ Notice of Proposed Rulemaking on Analytical Principles Used in Periodic Reporting (Proposal Five), Dkt. No. RM2018-8 (Jun. 28, 2018), at 5.

² See United Parcel Service, Inc.'s Second Motion Requesting Access to Non-Public Materials Under Protective Conditions, Dkt. No. RM2018-8 (Jul. 31, 2018), at 1.

³ See Order Granting Motion for Access to Library Reference USPS-RM2018-8/NP3 And Holding Motion for Access to Library Reference USPS-RM2018-8/NP1 in Abeyance Pending Further Action, Dkt. No. RM2018-8 (Aug. 1, 2018), at 1.

UPS has worked diligently to analyze the myriad issues implicated by the Postal Service's proposal. But UPS would like additional time to evaluate and understand the various complex issues, including the nature of various inbound letter post products and shapes, to conduct its own comparison with the established costing procedures, and if necessary, to consider alternative solutions to address them.

Because the issues that need to be analyzed by counsel and consultants are complex and somewhat opaque, UPS requests that the Commission extend the comment deadline to allow commenters adequate time to consider and evaluate the Postal Service's responses. Accordingly, UPS requests that the Commission extend the deadline for filing comments to August 29, 2018. UPS submits that a modest extension of the comment deadline will not significantly delay the proceeding or adversely affect any participant.

Respectfully submitted,

UNITED PARCEL SERVICE, INC.,

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